

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GO GLOBAL RETAIL LLC,

Plaintiff,

v.

DREAM ON ME, INDUSTRIES, INC., and  
DREAM ON ME, Inc.,

Defendants.

Case No. 1:23-cv-07987-AS

**CIVIL ACTION****CHART IN SUPPORT OF  
MOTION TO DISMISS**

Pursuant to the Court's Individual Practices Rule 8(G)(i), Defendants, Dream On Me, Industries, Inc. and Dream on Me, Inc. (collectively "DOM"), respectfully submit the chart below in support of DOM's Motion to Dismiss the Amended Complaint filed by Plaintiff, Go Global Retail, Inc. ("Plaintiff"):

<b>Cause of Action</b>	<b>Element(s) Not Plausibly Plead</b>
Count I – Breach of Contract	The Amended Complaint fails to plead how DOM's alleged misconduct caused any damages to Plaintiff.
Count III- Unjust Enrichment	<ul style="list-style-type: none"> <li>• The Amended Complaint fails to plead how DOM was enriched at Plaintiff's expense.</li> <li>• Equity does not prevent DOM from retaining anything from Plaintiff because Plaintiff does not allege what specific information DOM has used or is continuing to use that was improperly obtained from Plaintiff to cause Plaintiff any damages.</li> </ul>
Count IV – Constructive Trust	This claim fails because the Amended Complaint does not sufficiently allege unjust enrichment (see Count III)
Count V – Violation of DTSA	The Amended Complaint fails to plead how DOM's alleged violation of the DTSA caused any damages to Plaintiff.
Count VI –Misappropriation	The Amended Complaint fails to plead how DOM's alleged misappropriation caused any damages to Plaintiff.